



June 14, 2018

TSCA Confidential Business Information
Center (7407M)

Attention: TSCA CBI Substantiations
U.S. Environmental Protection Agency
1201 Constitution Avenue, N.W.
WJC East; Room 6428
Washington, D.C. 20004-3302

**CONTAINS TSCA
CONFIDENTIAL BUSINESS
INFORMATION**

Re: Substantiation for Confidential Business Information Claims

Dear Sir or Madam:

Stepan Company (the Company), is hereby submitting substantiation to the U.S. Environmental Protection Agency (EPA), pursuant to section 14(c)(3) of the Toxic Substances Control Act (TSCA) (15 U.S.C. § 2601 *et seq.*) and for the confidential business information (CBI) claims the Company made in its Premanufacture Notice submission by providing answers to the below listed questions.

We are substantiating all CBI claims asserted by the Company that were made by checking the "CBI" boxes.

Substantiation Questions and Answers:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.

[REDACTED]

2. Information submitted to the EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?

[REDACTED]

[REDACTED]

3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information be considered confidential?

[REDACTED]

4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? If so, specify which.

[REDACTED]

5. Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

[REDACTED]

6. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

[REDACTED]

7. For each item or category of information claimed as confidential, *explain with specificity* why release of the information is likely to cause substantial harm to

your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, please explain whether the information is the kind that would customarily not be released to the public.

[REDACTED]

9. Whether you assert the information as voluntary or involuntary, please address why disclosure of the information would tend to lessen the availability to the EPA of similar information in the future.

[REDACTED]

10. If you believe any information to be (a) trade secret(s), please so state and explain the reason for your belief. Please attach copies of those pages containing such information with brackets around the text that you claim to be (a) trade secret(s).

[REDACTED]

11. Explain any other issue you deem relevant (including, if pertinent, reasons why you believe that the information you claim to be CBI is not emission data or effluent data).

[REDACTED]

* * *

Please let us know if you need any additional information to grant these CBI claims. We also look forward to your response to our question regarding the applicability of the substantiation exemption at section 14(c)(2) to certain CBI claims listed in the introductory section of this letter.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]